
PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 18, 2011

Mr. Jim Kiefer
Director Project Development
Central Valley Gas Storage, LLC
3333 Warrenville Road, Suite 130
Lisle, Illinois 60532

Subject: *Central Valley Natural Gas Storage Project - Request for Notice to Proceed (NTP 10A) with Construction Activities Associated with Installing Berms to Support Preparation of the Natural Gas Pipeline Right of Way. (Application No. 09.08.008).*

Dear Mr. Kiefer:

Central Valley Natural Gas Storage has requested authorization from the California Public Utilities Commission (CPUC) to commence construction activities associated with installing berms along the pipeline right of way at identified locations provided in the NTP request letter submitted by CVGS on April 12, 2011. The berms are required in order to prevent water associated with rice farming to enter the pipeline work area.

The construction activities will include removal of the topsoil in order to construct a berm within the rice fields to protect areas of the pipeline right-of-way that are subject to flooding to prepare the fields for rice production.

The Central Valley Natural Gas Storage project was evaluated in accordance with the California Environmental Quality Act and a Certification of Public Convenience and Necessity (CPCN) was granted by the CPUC on October 14, 2010 (Decision 10-10-001). **NTP #10A is granted by CPUC for the proposed construction activities based on the following factors:**

- The Mitigated Negative Declaration prepared for the Central Valley Gas Storage project defined required mitigation measures to be implemented prior to project construction. The relevant mitigation measures for the construction on the berms along the pipeline right-of-way are summarized in *Attachment A*. Central Valley's compliance with the pre-construction component for each measure is noted in the status table.
- All construction personnel working on the Central Valley Gas Storage project have received environmental training and will be briefed on specific measures to be implemented during construction.

Robert M. Brown
April 18, 2011

The conditions noted below shall be met by Central Valley Gas Storage and its contractors:

- Construction activities associated with preparing the right of way on properties identified in Variance Request #1 (April 12, 2011) for proposed pipeline realignments shall be prohibited until CVGS receives potential approval from CPUC for Variance Request #1.
- Copies of all relevant permits, compliance plans (i.e., MMCRP, SWPPP, etc.), and this Notice to Proceed shall be available on-site for the duration of construction activities. Copies of permits shall be provided to the CPUC upon request.
- All crew personnel shall be appropriately trained on environmental issues, including requirements of the MMCRP, prior to starting work. A log shall be maintained on-site with the names of all crew personnel trained and submitted to the CPUC.
- Central Valley shall comply with all applicable mitigation measures while conducting construction activities within the approved work limits associated with this Notice to Proceed. The approved work limits shall be those identified in the Mitigated Negative Declaration prepared for the Central Valley Gas Storage project and any additional work spaces that have been approved by the CPUC through the variance request process.

Sincerely,



Eric Chiang
CPUC Environmental Project Manager

cc: D. Hochart, Dudek
S. Eckardt, Dudek
S. Bushnell-Bergfalk, ICF
J. Kiefer, Central Valley Gas Storage, LLC
N. McIntire, Flour Inc.
H. Salvage, Flour Inc.

Att: Attachment A – Mitigation Measures

ATTACHMENT A

Mitigation Measures

**MITIGATION MONITORING, COMPLIANCE
AND REPORTING PROGRAM**

Central Valley Gas Storage Project

Attachment A – Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Short-term and long-term visual impacts.	—	AES-1	The following measures would be implemented as part of the proposed project to minimize visual impacts of the project and to be consistent with Colusa County General Plan policies. <ul style="list-style-type: none"> • Construction disturbances will be minimized to help reduce contact between exposed soil and naturally vegetated areas, and clearing of vegetation and trees at facility sites will be minimized. • Disturbed agricultural land will be replanted following pipeline construction, if requested by the landowner. • All above ground structures will be painted with non-glare, earth-tone colors to blend with the surrounding vegetation/landscape. • Shielded, non-glare lighting will be used at facilities. 	Central Valley to implement measure as defined and incorporate commitments into construction contracts. <ul style="list-style-type: none"> • CPUC to verify proposed building materials and replanting of agricultural lands along the disturbed areas through review of preconstruction plans and samples. • CPUC to verify consultation with Colusa County through meeting notes, and review of project implementation in the field. 	Prior to and during construction. Effectiveness Criteria – Materials are non-reflective and are considered consistent with General Plan policies by Colusa County.	All		This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CV/GS prior to issuance of the NTP associated with construction of the pipeline.
Nighttime lighting during 24/7 drilling activities and well pad and pull-back activities at HDD sites.	AES-1	—	Night lighting for construction at the well pad and horizontal directional drilling (HDD) drilling sites, if required, shall be fully shielded and directed away from residential areas. Lights shall be turned off in areas where they are no longer needed.	Central Valley to implement measure as defined and incorporate commitments into construction contracts.	Prior to and during construction. CPUC to ensure that commitments have been incorporated into construction contract specifications. CPUC to inspect periodically to ensure correct placement of lighting to prevent night lighting impacts to residential areas.	Remote Well Pad Site Observation Wells	Pre-Construction Component Complete	CPUC verified on March 2, 2011 that commitments have been incorporated into the construction contract specifications.
Potential for short-term and long-term loss of use of land, crops, and agricultural structures.	—	AGRL-1	As a public utility, Central Valley is required to offer appropriate compensation for land held in private ownership as part of the acquisitions of utility easements. Central Valley would compensate landowners for any permanent crop losses at above ground facility sites and temporary crop losses in the year of construction and, if applicable, will compensate for the permanent removal of any structures and agricultural-related improvements that are necessary to construct the project.	Central Valley would compensate landowners as part of the acquisition of utility easements.	Central Valley to document compensation and provide measure to CPUC at least 2 weeks prior to construction of the applicable construction phase(s) (see Mitigation Measure AG-1).	All	Pre-Construction Component Complete	CPUC verified on March 18, 2011 that Central Valley has provided compensation
Potential for short-term and long-term loss of use of land, crops, and agricultural structures.	AG-1	—	In areas where right-of-way (ROW) is to be acquired by fee or easement, Central Valley shall compensate the property owner at "fair market value" in compliance with federal and state regulations. The determination of "fair	Central Valley to document compensation and provide verification of compliance with measure to CPUC.	Prior to and post construction.	All	Pre-Construction Component Complete	CPUC verified on March 18, 2011 that Central

Impact	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Potential for limited access to agricultural fields during construction.	market value ¹ shall be determined by a professional land appraiser retained by Central Valley. Central Valley shall provide qualifications or the professional land appraiser and a copy of appraisals to the California Public Utilities Commission (CPUC). In areas where temporary impacts would occur due to construction, Central Valley shall replace or compensate property owners for compensable private facilities and crops that were removed for construction. Replacement of facilities and crops shall occur to the extent they are not detrimental to future pipeline or natural gas operations. Compensation shall be determined by the professional land appraiser.	compensable.	Central Valley to confirm land appraiser meets requirements, and landowners are appropriately compensated.			Valley has provided compensation.
Potential for limited access to agricultural fields during construction.	—	Central Valley to implement measure as defined and incorporate commitments into construction contracts.	Central Valley to provide documentation of coordination with affected parties and confirmation with all required conditions to ensure access would be maintained.	Prior to and during construction for all areas where access restrictions are expected during construction of the project.	Natural Gas Connecting Pipeline – Segment A and B	Pre-Construction Component Complete
Potential loss of orchard trees.	—	Central Valley shall coordinate, prior to construction, with owners of land adjacent to the pipeline route regarding temporary blockage of access to the owner's parcel due to pipeline construction. Alternative access routes shall be provided, or farmers shall be provided breaks in spoil piles, trenches, or pipe strings to accommodate their need for field access during construction.	Central Valley to provide documentation to CPUC that affected parties were noticed at least 2 weeks prior to construction of the applicable phase(s).	CPUC to inspect to ensure access is being maintained during construction.	Natural Gas Connecting Pipeline – Segment A and B	CPUC verified on April 18, 2011 that Central Valley has coordinate with affected parties.
Potential for dust to be generated by construction activities.	AIR-1	If final design of the 14.7-mile connecting pipeline would result in a loss of trees in the orchard along the alignment, Central Valley will compensate the landowner for permanent crop loss.	Central Valley will compensate landowners as defined by measure and will incorporate measure into construction contracts.	Prior to construction.	Natural Gas Connecting Pipeline – Segment A and B	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.
Potential for dust (PM10) to be generated by construction activities.	—	The following measures would be implemented as part of the proposed project to minimize dust emissions and reduce short-term construction impacts to a less-than-significant level: <ul style="list-style-type: none"> • Water all active construction areas (subject to vehicle travel) at least twice (as necessary) daily. • Cover all trucks hauling soil, sand, and other loose materials, or require all trucks to maintain at least 2 feet of freeboard. • Water (as necessary) unpaved access roads, parking areas, and staging areas at construction sites that receive regular vehicle travel. • Sweep daily with water sweepers all paved public roads where the pipeline right-of- 	Central Valley to implement measures as defined and incorporate commitments into construction contracts.	Prior to and during construction.	All	Pre-Construction Component Complete.

Attachment A – Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Potential for NOx and greenhouse gas (GHG) emissions from all diesel powered construction equipment, including support equipment.	—	AIR-2	<ul style="list-style-type: none"> • Sweep paved streets daily with water sweepers if visible soil material is carried onto adjacent public streets. • Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (e.g., dirt and sand). • Limit traffic speeds on unpaved roads to 15 miles per hour. • Install sandbags or other erosion control measures to prevent site runoff to public roadways. • Replant vegetation in disturbed areas as quickly as possible, where determined appropriate and in consultation with the landowner. • Install wheel washers for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the site. • Limit the area subject to excavation, grading, and other construction activity at one time. <p>Central Valley will notify the California Public Utilities Commission (CPUC) that the Colusa County Air Pollution Control District (CCAPCD) has issued an "Authority to Construct" air permit before beginning construction of the compression facility.</p>	<p>Central Valley would implement the following measures to reduce NOx and GHG emissions from all diesel powered construction equipment and vehicles:</p> <ul style="list-style-type: none"> • To the extent feasible, all construction diesel engines rated at 100 hp or more shall meet, at minimum, the Tier 2 California Emissions Standards for Off-Road Compression-Ignition Engines as specified in Title 13 California Code of Regulations Section 2423 (b)(1), unless such engine is not available for a particular type of equipment. In the event a Tier 2 engine is unavailable, that engine shall meet the Tier 1 standards. In the event that a Tier 1 engine is unavailable for any off-road engine larger than 100 hp, that engine shall be equipped with a catalyzed diesel particulate filter (soot filter), unless certified by the engine manufacturer that the use of such devices are not practical for specific engine types. For purposes of this measure, the use of such devices is considered not practical if any of the following conditions apply: <ol style="list-style-type: none"> 1. There is no available soot filter that has been verified by either the California Air Resources Board or the U.S. Environmental 	All	At least 30 days prior to construction, during construction, after receipt of the CCAPCD Authority to Construct.	Pre-Construction Component Complete.	CPUC verified commitments have been included in contract documents specifying all construction diesel engines rated at 100 hp or more shall meet, at minimum, the Tier 2 California Emissions Standards for Off-Road Compression-Ignition Engines as specified in Title 13 California Code of Regulations Section 2423 (b)(1), unless such engine is not available for a particular type of equipment. CPUC verified commitments have been included as part of the contract documents on March 2, 2011.
							Carpooling requirement is	

Attachment A –Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
			<p>Protection Agency (EPA) for the engine in question.</p> <p>2. The construction equipment is intended to be on site for 10 days or less.</p> <p>3. The use of a soot filter may be terminated immediately if one of the following conditions apply:</p> <ul style="list-style-type: none"> a. The use of a soot filter is excessively reducing normal availability of the construction equipment due to increased downtime for maintenance and/or reduced power output due to an excessive increase in backpressure. b. The soot filter is causing or is reasonably expected to cause significant engine damage. c. The soot filter is causing or is reasonably expected to cause a significant risk to the workers or the public. d. Any other seriously detrimental cause that has the approval of the CPUC prior to the termination being implemented. <ul style="list-style-type: none"> • All heavy earthmoving equipment and heavy-duty construction-related trucks with engines shall be properly maintained and the engines tuned to the engine manufacturer's specifications. • To the extent feasible, unnecessary construction equipment and vehicle idling time will be minimized. The ability to limit construction vehicle idling time is dependent upon the sequences of construction activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel powered vehicles, have extended warm-up times following start-up. Where such diesel powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The proposed project will apply a "common sense" approach to vehicle use; if a vehicle is not required for use immediately or continuously for construction activities, its engine will be shut off. Construction foremen will include briefings to crews on vehicle use as part of preconstruction conferences. Those briefings will include discussion of a common sense approach to vehicle use. • Central Valley will institute a carpooling program to transport workers from staging areas to the work site. 					not applicable for this phase of the project.
Potential for NOx emissions.	—	AIR-3	Central Valley will lease NOx emission credits from the CCAPCD in an amount that offsets all construction-related NOx emissions exceeding	Central Valley to implement measure as defined and incorporate commitments into	Central Valley to provide verification to the CPUC that the mitigation credits have	The NOx mitigation credits shall be leased prior to any	All	Pre-Construction Component Complete.

Attachment A – Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Develop and implement a worker environmental awareness program.	—	BIO-1	CAPCD's significance threshold of 137 pounds per day after implementation of AIR-2. Based on the NOx pounds per day emission estimates for each construction phase, and the length of those phases, NOx emissions would exceed the CCAPCD threshold by a total of 28,438 pounds, or 14.2 tons (see Appendix B). Consequently, Central Valley will purchase emission credits to offset this amount of NOx emissions.	Central Valley to implement measure as defined and incorporate commitments into construction contracts.	Central Valley to provide a copy of the worker training program for review and approval at least 30 days prior to start of construction. Central Valley to provide verification to CPUC of implementation of worker training program and compliance with measure as defined through providing sign-in sheets on a weekly basis. All construction personnel that have been trained shall receive a sticker for their hard hat indicating they have completed environmental awareness training.	Prior to and during construction.	All	Pre-Construction Component Complete.
Obtain and comply with state, federal, and local permits.	—	BIO-2	Before any work occurs in the project area, including grading, Central Valley would conduct mandatory contractor/worker environmental awareness training for construction, monitoring, supervisory, and engineering/inspector personnel. The awareness training would be provided to all construction personnel to discuss sensitive environmental resources known or having the potential to occur in the project region, best management plans, and permit conditions. If new construction personnel are added to the project, Central Valley would ensure that the personnel receive the mandatory training before starting work.	Central Valley to implement measure as defined and incorporate commitments into construction contracts. Copies of the permits will be provided to the CPUC and contractor at least 2 weeks prior to the applicable phase(s).	CPUC to ensure that commitments have been incorporated into construction contracts. CPUC to verify CDFG, ACOE, USFWS, and RWQCB review and approval and that copies of all requisite permits be provided prior to construction.	Prior to construction.	Compressor Station Remote Well Pad Site Observation Well Conversions Saltwater Disposal Well Natural Gas Connecting Pipelines	Central Valley provided CPUC with the following permits. <ul style="list-style-type: none">• CWA Section 401 water quality certification from the Central Valley Water Board.• Clean Water Act (CWA) Section 404 nationwide permit from the U.S. Army Corps of Engineers (ACOE)• CWA Section 401 water quality certification from the Central Valley Water Board (all Section 404 permits require a Section 401 water quality certification from the Regional Water Quality Control Board (RWQCB))• CWA Section 402(National Pollutant Discharge Elimination System (NPDES) permit from the State Water Board (requiring preparation of a Stormwater Pollution Prevention Plan (SWPPP))• Section 1602 Streambed Alteration Agreement and 2081 Agreement from the Department of Fish and Game (CDFG)• Biological Opinion from the U.S. Fish and Wildlife Service (USFWS), Central Valley is responsible for obtaining all required permits and authorizations from local, state, and federal agencies. If a conflict arises between the provisions of any of the permits, Central Valley would comply with the provision that offers the greatest protection to water.
								CPUC verified on January 26, 2011 that the mitigation credits have been leased.

Attachment A—Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Install temporary construction barrier fencing to protect sensitive biological resources adjacent to the construction zone.	—	BIO-3	quality, species of special concern, and/or critical habitat. Copies of the permits will be provided to the contractor with the construction specifications.	Central Valley to implement measure as defined and incorporate commitments into construction contracts.	Central Valley to provide survey documentation report to CPUC at least 30 days prior to construction regarding sensitive biological habitat. CPUC to inspect periodically during construction in order to ensure measures are being implemented as defined.	Prior to and during construction.	All	Pre-Construction Component Complete. CVGS provide survey documentation on April 13, 2011.
Potential for long-term loss of woody riparian vegetation.	—	BIO-4	The construction specifications would require a qualified biologist identify sensitive biological habitat on site and identify areas to avoid during construction. Sensitive requirements for construction, including staging and access, will be fenced off to avoid disturbance in these areas. The contractor would install construction barrier fencing to identify environmentally sensitive areas. Sensitive resources that occur in and adjacent to the construction area include woody riparian vegetation, wetlands (including suitable habitat for federally listed invertebrates), giant garter snake aquatic and upland habitat, western pond turtle aquatic habitat, elderberry shrubs that provide potential habitat for the valley elderberry longhorn beetle (VELB), and trees that support nests of sensitive bird species. Before construction, the contractor will work with the project engineer and a resource specialist to identify the locations that require barrier fencing and will place stakes around the sensitive resource sites to indicate these locations. In some areas, staking and flagging may be appropriate and would be determined by the environmental compliance monitor. The protected area would be designated an environmentally sensitive area and clearly identified on the construction specifications. The fencing would be installed before construction activities are initiated and would be maintained throughout the construction period.	Central Valley to implement measure as defined and incorporate commitments into construction contracts.	Central Valley to provide verification to CPUC of measure including submittal of construction contract. CPUC to inspect periodically during construction in order to ensure measures are being implemented as defined.	Prior to and during construction.	Natural Gas Connecting Pipelines – Segment A	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.
Potential for long-term loss of woody riparian vegetation.	—	BIO-5	Central Valley would compensate for the removal or loss of woody riparian vegetation (trees and shrubs) a minimum ratio of 2:1 (2 acres for every 1 acre removed). Central Valley would purchase mitigation bank credits	Central Valley to implement measure as defined and incorporate commitments into construction contracts. Central Valley would provide written	CPUC to review and verify written evidence of compensation.	Prior to and during construction.	Natural Gas Connecting Pipelines – Segment A	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-

Attachment A –Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions evidence to CPUC and other appropriate resource agencies (e.g., CDFG) that compensation has been established through the purchase of mitigation credits.	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Potential for disturbance of waters of the United States, including wetlands.	—	BIO-6	To the extent possible, Central Valley would avoid and minimize impacts on waters of the United States, including wetlands, by implementing the following measures. These measures would be incorporated into contract specifications and implemented by the construction contractor: <ul style="list-style-type: none"> • The project will be designed, to the extent possible, to avoid direct and indirect impacts on waters of the United States, including wetlands. • Construction activities will be avoided in saturated or ponded natural wetlands and drainages during the wet seasons (spring and winter) to the maximum extent possible. Where such activities are unavoidable, protective practices, such as use of padding or vehicles with balloon tires, will be employed. • Exposed drainage banks and levees above drainages will be stabilized immediately upon completion of construction activities. Other waters of the United States will be restored in a manner that encourages vegetation to re-establish to its pre-project condition and reduces the effects of erosion on the drainage system. • Any trees, shrubs, debris, or soils that are inadvertently deposited below the ordinary high water mark (OHWM) of streams will be removed in a manner that minimizes disturbance of the drainage bed and bank. • To the extent possible, in-stream construction within the OHWM of natural drainages crossed by a pipeline alignment will be restricted to the low-flow period (generally April through October). • All activities will be completed promptly to minimize their duration and resultant impacts. 	Central Valley to implement measure as defined and incorporate commitments into construction contracts.	Prior to and during construction.	Natural Gas Connecting Pipelines – Segments A & B	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.	
Potential for disturbing burrowing owl burrows during construction activities.	—	BIO-7	If wildlife surveys indicate that the annual grasslands west of the Glen-Colusa Canal support potential burrows, Central Valley will retain a qualified biologist to conduct preconstruction surveys for active burrows according to CDFG guidelines. CDFG recommends that preconstruction surveys be approved qualified biologist to	Central Valley to implement measure as defined and incorporate commitments into construction contracts.	Prior to and during construction.	Metering Station & Natural Gas Connecting Pipeline Segment A on west side of Glen-	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.	

Attachment A—Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions perform surveys.	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
			<p>conducted at all construction sites (except paved areas) and within a 250-foot-wide buffer zone around the construction site to locate active burrowing owl burrows.</p> <p>If no burrowing owls are detected, then no further actions will be taken. If active burrowing owls are detected, the following measures will be implemented by Central Valley:</p> <ul style="list-style-type: none"> • When destruction of occupied burrows is unavoidable outside the nesting season (September 1–January 31), unsuitable burrows will be enhanced (enlarged or cleared of debris) or new burrows created (installing artificial burrows) at a ratio of 2:1 on protected lands approved by CDFG. Newly created burrows will follow guidelines established by CDFG. • If owls must be moved away from the project construction area, passive relocation techniques (e.g., installing one-way doors at burrow entrances) will be used instead of trapping. At least 1 week will be necessary to accomplish passive relocation and allow owls to acclimate to alternate burrows. • If active burrowing owl burrows are found and the owls must be relocated, Central Valley will offset the loss of foraging and burrow habitat in the project construction area by acquiring and permanently protecting foraging habitat (the acreage would be determined through consultation with CDFG). • If avoidance is the preferred method of dealing with potential impacts, no ground disturbing construction activities will occur within 160 feet of occupied burrows during the non-breeding season (September 1–January 31) or within 250 feet during the breeding season (extends from March through August, peaking in April and May). 				Colusa Canal	<p>by CVGS prior to issuance of the NTP associated with construction of the pipeline.</p>
Potential for impact to elderberry shrubs.	—	BIO-9		<p>Before any ground-disturbing activity, Central Valley will ensure that a minimum 4-foot-tall temporary, plastic mesh-type construction fence is installed at least 20 feet from the driplines of elderberry shrubs that are within 100 feet of the construction area. The fencing will be installed in a way that prevents equipment from enlarging the work area beyond the delineated work area. The fencing will be checked and maintained weekly until all construction is completed.</p> <p>No construction activity, including grading, will be allowed until this condition is satisfied. No grading, clearing, storage of equipment or machinery, or other disturbance or activity</p>	<p>Central Valley to implement measure as defined and incorporate commitments into construction contracts.</p>	<p>Prior to and during construction.</p>	Natural Gas Connecting Pipeline-Segment A	<p>Pre-Construction Component Complete.</p> <p>CVGS provide survey documentation on April 13, 2011 verifying that elderberry shrubs located along access roads would be fenced prior to construction.</p>

Attachment A – Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure may occur until the CPUC environmental compliance monitor has inspected and approved all temporary construction fencing. The fencing and a note reflecting this condition will be shown on the construction plans.	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Potential to impact western pond turtles.	—	BIO-11	To avoid construction-related impacts on western pond turtles, Central Valley will retain a wildlife biologist to conduct a preconstruction survey for western pond turtles no more than 48 hours before the start of construction activities associated with the 14.7-mile gas pipeline component. The wildlife biologist will look for adult pond turtles. If a western pond turtle is located in the construction area, the biologist will move the turtle to a suitable aquatic site outside the construction area.	Central Valley to implement measure as defined and incorporate commitments into construction contracts. Central Valley to retain qualified biologist to perform surveys.	Central Valley to provide survey report documentation to CPUC and to provide verification to CPUC of compliance with measure as defined.	Prior to and during construction for all areas identified as suitable western pond turtle habitat.	Natural Gas Connecting Pipeline – Segment A and B	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.
Potential to impact giant garter snake habitat.	—	BIO-12	Because of the nature and scale of anticipated adverse effects on giant garter snakes and their habitat, mitigation and compensation measures presented in this measure were derived primarily from the USFWS's Standard Avoidance and Minimization Measures during Construction Activities in Giant Garter Snake Habitat. Mitigation measures also are based on the guidance provided in the Programmatic Formal Consultation for ACOE 404 Permitted Projects with Relatively Small Effects on the Giant Garter Snake within Butte, Colusa, Glenn, Fresno, Merced, Sacramento, San Joaquin, Solano, Stanislaus, Sutter, and Yolo counties, California (USFWS 1997). Mitigation measures to avoid and minimize effects on the giant garter snake are as follows: • At such time when construction plans are finalized, a biologist will conduct a preconstruction survey for giant garter snake and its habitat at each site where construction activities will occur. This survey will identify and document the specific locations of suitable habitat within or adjacent to proposed construction areas. The biologist will be responsible for submitting survey maps and immediately reporting the presence of the species, if found, to the USFWS in order to determine appropriate actions.	Central Valley to implement measure as defined and incorporate commitments into construction contracts. Central Valley to retain USFWS-approved qualified biologist to perform surveys.	Central Valley to provide verification to CPUC of compliance with measure as defined. Central Valley to provide CPUC and USFWS copies of survey maps and documentation prior to construction of the applicable phase(s).	Prior to and during construction for all areas identified as suitable giant garter snake habitat.	Compressor Station Remote Well Pad Site Observation Well Conversions Saltwater Disposal Well and Tank Natural Gas Connecting Pipelines	To be completed throughout construction. On-going, daily preconstruction surveys will be conducted by a USFWS-approved biological monitor during construction.

Attachment A –Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Potential to impact giant garter snake habitat.			<p>minimize habitat disturbance to the maximum extent feasible.</p> <ul style="list-style-type: none"> Time construction activities within habitat so that they occur between May 1 and October 1. This is the active period for giant garter snakes and direct mortality is lessened because snakes are expected to actively move and avoid danger. Inform construction personnel to recognize giant garter snakes and their habitat. Construction personnel should receive worker environmental awareness training prior to undertaking work at construction sites. Survey the project area for giant garter snakes 24 hours prior to initiating construction activities. After construction has been initiated, a biologist will be available thereafter. If a snake is encountered during construction, the biologist will have the authority to stop all construction activity until appropriate corrective measures can be completed or it has been determined that the snake will not be harmed. A survey of the project area should be repeated if a lapse in construction activity of 2 weeks or greater has occurred. Sightings and acknowledgement of incidental take will be reported to the USFWS immediately. Confine clearing to the minimum area necessary to facilitate construction activities. Flag and designate avoided giant garter snake habitat within or adjacent to the project area as an environmentally sensitive area. This area should be avoided by all construction personnel. Ensure any dewatered habitat remains dry for at least 15 consecutive days after April 15 and prior to excavating or filling the dewatered habitat. Remove temporary fill and construction debris and, wherever feasible, restore disturbed areas to pre-project conditions after construction activities. Restoration work may include such activities such as replanting species removed from banks or replanting emergent vegetation in the active channel. 				Compressor Station Remote Well Pad Site Observation Well	Pre-Construction Component Complete Central Valley has purchased WILDSIG credits from Wildlands' Ridge Cut
		BIO-13			Central Valley to implement measure as defined and incorporate commitments into construction contracts. Central Valley to provide a copy of the final Biological Opinion to the review of the Biological Opinions that were		Central Valley to provide verification to CPLIC of compliance with measure as defined.	Pre-Construction Component Complete

Attachment A – Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions CPUC prior to construction of the applicable phase(s).	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Potential to impact vernal pool fairy shrimp and vernal pool tadpole shrimp habitat.	—	BIO-14	issued for the Wild Goose Gas Storage Expansion and Pacific Gas and Electric (PG&E) Colusa Generating Station Projects, the USFWS will likely require a 1:1 ratio for temporary impacts to giant garter snake habitat. This mitigation ratio is consistent with the USFWS Programmatic Formal Consultation for ACOE 404 Permitted Projects with Relatively Small Effects on Giant Garter Snake within Butte, Colusa, Glenn, Fresno, Merced, Sacramento, San Joaquin, Solano, Stanislaus, Sutter, and Yolo Counties, California (USFWS 1997). The Biological Opinion will be provided to the CPUC to support their issuance of a notice to proceed for project components that support suitable giant garter snake upland and aquatic habitat.	Central Valley to implement measure as defined and incorporate commitments into construction contracts. Central Valley to retain qualified biologist to perform monitoring. • The on-site biological monitor will be present during ground disturbance activities occurring west of the Glenn-Colusa Canal to ensure that habitat is avoided and will have the authority to stop all construction activities that may result in the destruction of habitat. • Central Valley will prohibit all activities within 250 feet of suitable seasonal wetland habitat (unless there is a physical barrier such as a road or berm that eliminates a hydrologic connection and potential for indirect impacts to habitat during the winter months). This would include alteration of topography, dumping, burning, burying of garbage or fill materials, construction of access roads, placement of stormwater drains, and the use of pesticides or other toxic chemicals.	Central Valley to provide verification to CPUC of compliance with measure as defined.	Prior to and during construction for all areas identified as suitable vernal pool fairy shrimp and vernal pool tadpole shrimp habitat.	Metering Station Natural Gas Connecting Pipeline Segment A on west side of Glenn-Colusa Canal	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGSC prior to issuance of the NTP associated with construction of the pipeline.
Potential to impact giant garter snake habitat.	BIO-1	—	Central Valley will implement all conditions and measures stipulated within the Biological Opinion to be issued by the U.S. Fish and Wildlife Service (USFWS) at the conclusion of the Section 7 consultation with the U.S. Army Corps of Engineers (ACOE) to minimize and/or avoid take and direct and indirect impacts on giant garter snake. A copy of the final Biological Opinion shall be submitted to the CPUC prior to any construction that would impact giant garter snakes or habitat potentially supporting this species, as evidence of the commitment by Central Valley to implement all conditions and measures contained therein.	Central Valley to implement this measure as defined and incorporate commitments into construction contracts. Central Valley to provide a copy of the final Biological Opinion to the CPUC prior to construction of the applicable phase(s).	Central Valley to provide verification of compliance with measure as defined. CPUC to review final Biological Opinion.	Prior to construction.	Compressor Station Remote Well Pad Site Observation Well Conversions Saltwater Disposal Well and Tank Natural Gas Connecting Pipelines	Pre-Construction Component Complete.
								Central Valley provided USFWS Biological Opinion and commitments have been incorporated into the construction documents. CPUC verified pre-construction component was completed on March 2, 2011.

Attachment A—Mitigation Measures

Impact	Mitigation Measure/ Applicant Proposed Measure	APM No.	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Potential to impact the valley elderberry longhorn beetle.	BIO-2	—	Central Valley will implement all conditions and measures stipulated within the Biological Opinion to be issued by the USFWS at the conclusion of the Section 7 consultation with the ACOE to minimize and/or avoid take and direct and indirect impacts on valley elderberry longhorn beetles (VELB). A copy of the final Biological Opinion shall be submitted to the CPUC prior to any construction that would impact VELB or habitat potentially supporting this species as evidence of the commitment by Central Valley to implement all conditions and measures contained therein.	Central Valley to provide verification to the CPUC of compliance with measure as defined and incorporate commitments into construction contracts. Copies of the final Biological Opinion will be provided to the CPUC prior to construction of the applicable phase(s).	Prior to construction.	Natural Gas Connecting Pipeline – Segment A	Pre-Construction Component Complete.
Potential for impacts to wetlands.	BIO-3	—	Central Valley shall submit documentation of Section 404 wetland fill authorization to the CPUC prior to the start of construction. All conditions, stipulations, and measures to avoid, minimize, and/or mitigate for impacts to wetlands and other waters of the U.S. described and contained within the authorized permit shall be implemented by Central Valley, as approved by the CPUC. Documentation verifying the approved ACOE fill permit and associated conditions shall be presented to the CPUC prior to any project construction that would impact wetlands and other waters of the U.S. as evidence of the commitment by Central Valley to implement all conditions and measures contained therein.	Central Valley to implement mitigation measure as defined and incorporate commitments into construction contracts. Copies of the Section 404 authorization will be provided to the CPUC prior to construction of the applicable phase(s).	Prior to construction.	Natural Gas Connecting Pipelines – Segments A and B	Pre-Construction Component Complete.
Potential for wildlife to be trapped in ditches due to trenching activities during construction.	BIO-4	—	In order to prevent potential impacts to wildlife that may fall into open construction trenches associated with the connecting pipelines, the trenches shall be either covered with plywood, tarps, metal plates, or some other similar material, with the edges covered by soil, on a daily basis or will be back-filled on a daily basis. If the trenches are to be left open, escape ramps will be constructed at no more than 1,000-foot intervals along the sidewalls of the trench with at least one ramp placed at either end of the trench. The escape ramps must be at a 2:1 slope or less and may be constructed of any material (e.g., soil, wooden boards) so long as the ramps are placed immediately adjacent to a sidewall. Escape ramps shall also be placed within any bore pits that will remain open during construction activities. The spacing and design of the ramps shall consider the location and dimension of the bore pits and shall be at the discretion of the monitoring biologist.	Central Valley to provide verification to CPUC of measure including submittal of construction contract. Survey efforts will be documented by the biologist in the daily log and reported to the CPUC at the end of each week.	Prior to and during construction.	Natural Gas Connecting Pipelines – Segments A & B	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVCS prior to issuance of the NTP associated with construction of the pipeline.

Attachment A – Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Construction of the proposed project could affect undiscovered cultural resources.	—	CR-1	<p>any wildlife that may have fallen into the bore pits or open trenches. Any animals observed in the bore pits or trenches will be guided up available escape ramps or will be captured and moved out of the construction area. This survey effort will be documented by the biologist in the daily log and reported to the CPUC at the end of the week. If a state-listed or federally listed species (such as giant garter snake) requires removal from the bore pit or trench, this handling effort will be subject to the conditions of the Biological Opinion.</p> <p>Prior to construction, Central Valley will retain the services of a professional archaeologist to conduct on-site pedestrian inspections of those portions of the project area that are not flooded and that are considered by the archaeologist to have the potential to have archaeological deposits, and which have not already been subjected to archaeological inspection. Any identified cultural resources will be recorded on standard Department of Parks and Recreation file record forms. The archaeologist will consult with Central Valley to determine methods of avoiding impacts (such as boring under the resource or routing around the resource) on any potentially significant cultural resources that are identified as a result of these additional investigations. If any potentially significant cultural resources cannot be avoided, then additional documentation and data recovery efforts will be implemented by a qualified archaeologist in consultation with CPUC, ACOE, and the State Historic Preservation Officer. Additional documentation will include preparation of formal National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) evaluations of recorded resources.</p>	<p>Central Valley to retain a qualified archaeologist to perform construction monitoring.</p> <p>Archaeologist to provide completed site forms to Central Valley and CPUC.</p> <p>Central Valley to provide additional documentation, as necessary, to CPUC, ACOE, and the State Historical Preservation Office (SHPO).</p>	<p>The qualifications of the qualified archaeologist shall be provided to the CPUC at least 2 weeks prior to construction. CPUC to review completed site forms.</p>	During ground-breaking activities in all construction areas.	Non-surveyed portions of the project area.	Pre-Construction Component Complete.
Potential hazardous substance spills during construction.	—	HAZ-1	<p>The construction equipment used for the proposed project will require periodic maintenance and refueling. To reduce the potential for contamination by spills, no refueling, storage, servicing, or maintenance of equipment will be allowed within 100 feet of sensitive environmental resources. No refueling or servicing will be allowed without the placement of absorbent material or drip pans underneath the vehicle to contain spilled fuel. Any fluids drained from the machinery during servicing will be collected in leak-proof containers and taken to an appropriate disposal or recycling facility. If such activities result in spilling or accumulation of a product on the soil, the contaminated soil will be assessed and disposed of properly. Under no circumstances will contaminated soils be</p>	<p>Central Valley to incorporate measure as defined and incorporate into construction contracts.</p>	<p>CPUC to inspect periodically to ensure measure is being implemented.</p>	Prior to and during construction.	All	Pre-Construction Component Complete.
								CPUC verified on March 18, 2011 that commitments have been incorporated into construction contract specifications.

Impact	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
		<p>Mobile refueling trucks likely will be used for on-site refueling of construction equipment. The refueling trucks will be independently licensed and regulated to haul and dispense fuels to ensure that the appropriate spill prevention techniques are implemented.</p> <p>All maintenance materials (oils, grease, lubricants, antifreeze, and similar materials) will be stored at off-site staging areas. If those materials are required during field operations, they will be placed in a designated area away from site activities and sensitive resources.</p> <p>During construction, vehicles and equipment not in use will be parked or stored at least 100 feet from water bodies, wetlands, known archaeological sites, and other sensitive resource areas. These areas will be identified on the construction drawings, as appropriate. All washdown activities will be conducted at least 100 feet from sensitive environmental resources.</p>					
Potential hazardous substance spills during construction.	HAZ-2		<p>Central Valley to prepare a comprehensive Construction and Operation Safety and Emergency Response Plan that includes hazardous substance control, worker health and safety, incident response, and fire prevention and management. Each of these plan elements is briefly described below. The plan will be prepared prior to construction and will be submitted to the CPUC for review and approval.</p> <p>Release of Hazardous Substances and Emergency Response Element. This element of the plan will include measures that will be implemented if an accidental release occurs or if any subsurface hazardous materials are encountered during construction and during future operation of the facility. The provisions outlined in this plan will include telephone numbers of county and state agencies and primary, secondary, and final clean-up procedures.</p> <p>The plan will include the following measures to address hazardous materials generated from construction-related activities:</p> <ul style="list-style-type: none"> • Diesel fuel and petroleum-based lubricants will be stored only at designated staging areas. • All hazardous material spills or threatened releases—including petroleum products such as gasoline, diesel, and hydraulic fluid, regardless of the quantity spilled—must be reported immediately if the spill has entered or threatens to enter a water body of the state, has caused injury to a person, 	<p>Central Valley to provide CPUC copies of all plans developed in compliance with hazardous materials regulations at least 30 days prior to construction of the applicable phase(s).</p> <p>CPUC to review Construction and Operation Safety and Emergency Response Plan to ensure compliance with measure.</p>	30 days prior to construction	All	Pre-Construction Component Complete.

Attachment A – Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure or threatens injury to public health,	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
			<p>Sudden Uncontrolled Release of Natural Gas and Emergency Response Element. This element of the plan will include measures that will be implemented if there was a failure or rupture of a pipeline or compressor station component during future operation of the facilities. The provisions outlined in this plan will include a callout procedure with telephone numbers of local fire and police responders, as well as county and state agencies. The plan will address public safety measures, emergency evacuation routes, and traffic control. Coordination and training with other parties like PG&E and the local fire and police departments will also be part of this plan.</p> <p>Worker Health and Safety Element. This element of the plan will include provisions that establish worker training. This portion of the plan will also establish security measures to prevent unauthorized entry to cleanup sites and to reduce hazards outside the investigation/cleanup area. It will also address gas leaks, methods of evacuation, and general protection measures.</p> <p>Fire Prevention and Management Element. To minimize the potential fire risks during summer construction activities, this element of the plan will identify fire management measures that will be implemented during construction and operation. The plan will include the notification procedures and emergency fire precautions listed below.</p> <ul style="list-style-type: none"> • All internal combustion engines, stationary and mobile, will meet applicable regulatory standards. • Light trucks and cars with factory-installed (type) mufflers, in good condition, may be used on roads where the roadway is cleared of all vegetation. • "No Smoking" signs and fire rules will be posted at the contractor field offices and areas visible to employees during the fire season. • Equipment parking areas and small stationary engine sites will be cleared of all extraneous flammable materials. • Fire extinguishers will be installed at the compressor station and metering station. • Employee training in use of extinguishers and communication with the local fire departments will be provided to all personnel. 					
Potential for impact to the public or environment due to use of hazardous	HAZ-1	—		Central Valley and/or the project contractor will contain drilling mud and cuttings from well drilling and HDD in portable tanks and will	Prior to and during construction.	Natural Gas Connecting Pipeline	This measure is not applicable to the proposed construction activities	A-15

Attachment A –Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
materials.			remove and dispose of those at approved facilities for this type of waste.	contracts.	commitments have been incorporated into construction contract specifications. CPUC to inspect periodically to ensure measure is being implemented.	Prior to and during construction.	Segment A Remote Well Pad Site Observation Wells	identified in NTP 10-A. The pre-construction component will need to be satisfied by CVCS prior to issuance of the NTP associated with construction of the pipeline.
Potential for impact to the public or environment due to release of hazardous materials into the environment.	HAZ-5	—	If existing underground structures cannot be avoided, structures will be crossed by boring or ditching under them unless the owner of the structures allows them to be removed or the natural gas pipeline to be installed over them. The trench will be hand-dug in areas in close proximity to existing pipelines and other structures. A minimum clearance of 1 foot shall be maintained where feasible, between such lines or structures and the line being laid, unless otherwise specified. Special procedures, such as placement of protective materials between the pipeline and existing structures, will be followed to protect existing structures where this clearance is not feasible.	Central Valley to implement measure as defined and incorporate into construction contracts.	CPUC to ensure that commitments have been incorporated into construction contract specifications. CPUC to inspect periodically to ensure measure is being implemented.	Prior to and during construction.	Natural Gas Connecting Pipelines – Segments A & B	This measure is not applicable to the proposed construction activities identified in NTP 10-A. The pre-construction component will need to be satisfied by CVCS prior to issuance of the NTP associated with construction of the pipeline.
Potential to violate water quality standards or waste discharge requirements.			HYDRO-1	The reclamation effort will involve restoration of temporarily disturbed areas (where necessary) and installation of erosion control measures to comply with County grading permits and the NPDES permit from the State Water Board. Central Valley will prepare a SWPPP that describes when, where, and how such site reclamation will occur. Site-specific erosion control measures (nonvegetative or mechanical techniques) will be determined on a site-specific basis as part of this SWPPP. As part of the SWPPP, erosion and sediment control measures will be implemented to reduce the amount of soil that is displaced or transported from a land area and to control the discharge of soil particles that are displaced or transported. The standard control measures and practices listed below will be implemented during and after construction to reduce accelerated soil erosion and sedimentation impacts to a less-than-significant level:	Central Valley to receive approval of plans from Colusa County Public Works Department. Central Valley to provide verification to CPUC of measure, including submittal of construction contract at least 2 weeks prior to construction of the applicable phase(s).	Prior to issuance of grading permit	All	Pre-Construction Component Complete.

Attachment A –Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Potential to degrade water quality.	HYDRO-1	—	<ul style="list-style-type: none"> • Perform initial cleanup • Compact subsurface backfill material • Apply an appropriate seed mix, where determined necessary, in nonagricultural areas and through coordination with the landowner. <p>Construction inspectors will be on site during all construction activities and will reinforce the importance of confining all vehicular traffic to the existing ROW and access roads.</p>	<p>Central Valley shall develop and implement a groundwater monitoring plan that will include both pre-injection and post-injection monitoring of groundwater quality to identify any seepage of stored natural gas into the groundwater aquifers. In the event that stored natural gas is detected above the reservoir, Central Valley shall immediately consult with DOGGR and the Central Valley Regional Water Quality Control Board (RWQCB) to determine the appropriate remedial action required, including depressurization of the reservoir or other appropriate measures approved by DOGGR and the RWQCB. The monitoring and any potential remediation shall be under the supervision of DOGGR and RWQCB.</p>	<p>Central Valley to monitor groundwater and provide reports to DOGGR and RWQCB. CPUC to review groundwater monitoring plan to ensure compliance with measure.</p>	<p>Prior to construction associated with the first gas injection of any project component.</p>	<p>All</p>	<p>This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.</p>
Construction activities would temporarily increase local noise levels.	NOI-1	—	<p>Central Valley will incorporate the following measures into the construction contract specifications to reduce and control noise generated from construction-related activities such that construction noise does not exceed 60 dBA-Lmax between 7:00 p.m. and 7:00 a.m. weekdays and all day on Sundays and legal holidays at adjacent residences.</p> <ul style="list-style-type: none"> • Prohibit noise-generating construction activity within 900 feet of occupied dwelling units between the hours of 7:00 p.m. and 7:00 a.m. on weekdays and all day on Sundays and legal holidays, unless written approval is obtained from the resident. • Ensure that all construction equipment has sound-control devices no less effective than those provided on the original equipment. No equipment will have an unmuffed exhaust. • Implement appropriate additional noise-reducing measures as may be necessary, including but not limited to: <ul style="list-style-type: none"> ◦ Changing the location of stationary construction equipment ◦ Shutting off idling equipment ◦ Providing local enclosures or barriers around noise-generating equipment 	<p>Central Valley to implement mitigation measure as defined and incorporate commitments into construction contracts.</p>	<p>CPUC to inspect periodically for evidence of successful compliance with measure as defined.</p>	<p>Prior to and during construction.</p>	<p>All</p>	<p>Pre-Construction Component Complete.</p> <p>CPUC verified on March 18, 2011 that the commitments have been incorporated into construction contract specifications</p>

Attachment A—Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Construction activities would temporarily increase local noise levels.	NQI-1	—	<ul style="list-style-type: none"> ◦ Rescheduling construction activity ◦ Notifying nearby residents in advance of construction work. 	Central Valley to implement mitigation measure as defined and incorporate commitments into construction contracts.	CPUC to ensure that restrictions have been incorporated into construction contracts. CPUC to inspect periodically for evidence of successful compliance with measure as defined.	Prior to and during construction.	All	<p>Pre-Construction Component Complete.</p> <p>CPUC verified on March 18, 2011 that the commitments have been incorporated into construction contract specifications</p>
Construction would temporarily disrupt recreational activities.	REC-1	REC-1	<p>Central Valley will incorporate specifications to reduce and control noise generated from construction-related activities such that general construction noise (Monday through Saturday, 7:00 a.m. to 7:00 p.m., does not exceed 75 dBA, Leq) at noise sensitive receptors (e.g., occupied residences, churches, schools) into the project construction contract.</p> <p>Prior to finalizing the pipeline construction schedule and engineering plans, Central Valley will contact the Sacramento and Delavan National Wildlife Refuges (NWRs) and landowners to discuss the pipeline construction schedule and appropriate measures that could be implemented to reduce the impact on seasonal recreation activities (hunting and bird watching). Measures that may be implemented to ensure that construction does not conflict with fall/winter hunting season and birding on the adjacent wildlife refuges and private properties are listed below.</p> <ul style="list-style-type: none"> • Restrict construction activities to certain locations and times of day (avoiding early mornings and evening in hunting areas) • Post signs that notify recreationists of construction activities • Mail and post fliers that notify the public of construction activities. 	Central Valley to implement mitigation measure as defined and incorporate commitments into construction contracts.	CPUC to verify consultation with the NWRs and landowners through meeting notes, and review of project implementation in the field.	Prior to finalizing the pipeline construction schedule and engineering plans, and during construction.	Natural Gas Connecting Pipelines – Segment A and B	<p>This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.</p>
Detours, road and lane closures.	TRA-1	—	Central Valley will prepare a construction traffic plan to minimize short-term construction-related impacts on local traffic. These measures will include installation of temporary warning signs at appropriate locations along major road intersections. The signs will be placed at strategic locations near points of access and will be removed after all construction-related activities are completed. The plan will include (but may not be limited to) the measures listed below.	Central Valley to prepare construction traffic plan as defined.	Prior to issuance of grading permit(s).	All	<p>Pre-Construction Component Complete.</p> <p>Central Valley provided verification that Colusa County has received the traffic control plan on March 18, 2011.</p>	

Attachment A – Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
roads, and agricultural roads outside the immediate construction zone			• Consult with emergency service providers and develop an emergency access plan for emergency vehicle access in and adjacent to the construction zone.	Central Valley to implement measure. Central Valley to incorporate measure into construction contracts.	Central Valley will provide documentation of coordination efforts with affected adjacent property owners and emergency service providers to CPUC.	Prior to and during construction for all locations where temporary road or lane closures are required.	Natural Gas Connecting Pipelines – Segment A and B	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.
Road and lane closures.	TRA-1	—	The emergency access plan prepared as part of APM TRA-1 shall include providing access to residences along the pipeline alignment. Requirements of the plan shall include advanced notice, between 2 and 4 weeks prior to construction, by mail to adjacent property owners and emergency service providers as to where property access would be blocked, excavation plating, emergency vehicles being granted access via one open lane, short detours, and alternate routes.	Central Valley to implement measure. Central Valley to incorporate measure into construction contracts.	Central Valley to provide CPUC with construction notices for review and approval at least 60 days prior to construction. Notices to provide advanced notice of construction activities in order to limit disruption impacts.	Prior to and during construction.	Natural Gas Connecting Pipelines – Segments A & B	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.
Potential for discharge to not meet local water quality requirements.	U-1	—	All discharges shall be in compliance with local, state, and federal regulations pertaining to wastewater disposal. Approval shall be obtained from the Central Valley RWQCB prior to discharging water produced by dewatering and hydrotesting of pipelines.	Central Valley to implement measure as defined. Central Valley to incorporate measure into construction contracts. RWQCB approval to be submitted to CPUC.	CPUC to ensure that commitments have been incorporated into construction contracts. CPUC to verify RWQCB approval of dewatering and hydrotesting activities thereby minimizing the potential for water quality degradation.	Prior to and during construction.	Natural Gas Connecting Pipelines – Segments A & B	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.
Nighttime lighting during 24/7 drilling activities	AES-2	—	The applicants' drilling plan shall specify that lights shall be fully shielded and directed inward on the work area.	Central Valley to prepare and implement drilling plan and shall include light specification. Drilling plan to be submitted to the CPUC and Colusa County at least 2 weeks prior to construction of the applicable phase(s).	CPUC to ensure that commitments have been incorporated into construction contract specifications. CPUC to inspect periodically to ensure correct placement of lighting to prevent night lighting spillover effects.	Prior to and during construction.	Remote Well Pad Site Natural Gas Connecting Pipelines Observation Wells Saltwater Disposal Well and Tank	Pre-Construction Component Complete CPUC verified on March 2, 2011 that commitments have been incorporated into the construction contract specifications.
Temporary loss of use of land for agricultural purposes or damage to agricultural structures.	AGR-2	—	Following construction, agricultural fields will be surveyed and regraded to their original elevation where needed, and all rice field dikes and check boxes will be repaired or replaced. Although the trench backfill in agricultural areas will be compacted to minimize settling, follow-up elevation surveys will be provided if necessary, to ensure that field grading and irrigation flaws are not adversely affected. Fences and irrigation facilities will be replaced or repaired to their original condition following construction.	Central Valley to implement measure as defined and incorporate commitments into construction contracts.	Central Valley to document existing elevations in construction plans and provide a copy to CPUC. Within 30-days of completion of construction, Central Valley will complete follow-up elevation surveys and repair fences and irrigation facilities to original condition. Following completion, a final report will be submitted to the	Prior to and post construction.	Metering Station Observation Well Conversions Saltwater Disposal Well and Tank Natural Gas Connecting Pipelines	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.

Attachment A –Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Potential for tree roots to grow toward pipeline.	AG-3	—	Should the final designed pipeline occur within 15 feet of tree canopy drip lines (the outermost extent of the tree canopy), Central Valley, in coordination with affected landowners, shall implement methods to protect the pipeline from tree roots, such as the following: 1. An herbicide-embedded fabric (such as Biobarrier) could be placed in the trench above the pipeline and on the side adjacent the trees 2. Wrap the pipeline with a non-chemical root barrier fabric "sock" before placing into trench 3. Compact soil around pipeline to minimize/prevent root growth upon backfilling the trench.	Following final design, Central Valley to coordinate with land owner if pipeline within 15 feet of canopy drip line to determine method of protecting pipeline from roots as defined in measure. Central Valley to incorporate measure into construction contracts.	Central Valley to measure compliance with measure through providing a report to CPUC within 30 days following construction of the applicable phase(s) identifying measures that were completed in areas where the pipeline was located within 15 feet of the tree canopy drip lines. CPUC to inspect to ensure measures are being implemented.	During and post construction.	Natural Gas Connecting Pipelines – Segment A & B	This measure is not applicable to the proposed construction activities identified in NTP 10A. The component will need to be satisfied by CVGCS prior to issuance of the NTP associated with construction of the pipeline.
Potential for disturbance of tree-, shrub-, or ground-nesting white-tailed kite, northern harrier, loggerhead shrike, and non-special-status migratory birds and raptors.	BIO-8	—		Central Valley will implement one of the following measures, depending on the specific construction timeframe, to avoid disturbance of tree-, shrub- or ground-nesting birds, such as white-tailed kites, northern harriers, loggerhead shrikes, and white-faced ibis, and non-special-status migratory birds and raptors. • For project components that are scheduled for construction during the breeding season for these species (generally between February 15 and August 15), a qualified wildlife biologist will be retained to conduct the following focused nesting surveys within the appropriate habitat. • Tree- and shrub-nesting surveys will be conducted in riparian and oak woodland habitats within or adjacent to the construction area to look for white-tailed kite, loggerhead shrike, and other non-special-status migratory birds and raptors. • Ground-nesting surveys will be conducted in annual grasslands and agricultural lands within and adjacent to the construction area to look for northern harrier and other non-special-status migratory birds. The surveys should be conducted within 2 weeks before initiation of construction activities and at any time between February 15 and August 15. If no active nests are detected, then no additional measures are required. If surveys indicate that migratory bird or raptor nests are found in any areas that would be directly affected by construction activities (e.g., the noise associated with construction would substantially exceed ambient noise levels associated with highway/road or agricultural noise), then a no-disturbance buffer will be established around the site to avoid	Central Valley to provide survey report documentation to CPUC of the applicable phase(s) to be prepared by a qualified biologist.	Prior to and during construction for all areas identified as suitable habitat for tree-, shrub- or ground-nesting birds.	Compressor Station Remote Well Pad Site Observation Well Conversions Saltwater Disposal Well	CVGCS will be required to complete surveys within two weeks before initiation of construction activities and submit the survey results to the CPUC.

Attachment A –Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
			disturbance or destruction of the nest site until after the breeding season or after a wildlife biologist determines that the young have fledged (usually late June to mid-July). The extent of these buffers will be determined by a wildlife biologist, and will depend on the level of noise or construction disturbance, line of sight between the nest and the disturbance, ambient levels of agricultural and highway/road noise, and other disturbances, and other topographical or artificial barriers. These factors should be analyzed to make an appropriate decision on buffer distances. Construction activities that are scheduled to begin before the breeding season, (i.e., begin between August 16 and February 15) (pre-existing construction) can proceed. Optimally, all necessary vegetation removal should be conducted before the breeding season (generally between February 15 and August 15) so that nesting birds or raptors would not occur in the construction area during construction activities. If any birds or raptors nest in the project vicinity under conditions existing before construction, then it is assumed that they are habituated (or will habituate) to the construction activities. Under this scenario, the preconstruction survey described previously should still be conducted on or after February 16 to identify any active nests in the vicinity, and active sites should be monitored by a wildlife biologist periodically until after the breeding season or after the young have fledged (usually late June to mid-July). If active nests are identified on or immediately adjacent to the project site, then all nonessential construction activities (e.g., equipment storage and meetings) should be avoided in the immediate vicinity of the nest site, but the remainder of construction activities may proceed.					
Potential for impact to elderberry shrubs.	—	BIO-9		Before any ground-disturbing activity, Central Valley will ensure that a minimum 4-foot-tall temporary, plastic mesh-type construction fence is installed at least 20 feet from the driplines of elderberry shrubs that are within 100 feet of the construction area. The fencing will be installed in a way that prevents equipment from enlarging the work area beyond the delineated work area. The fencing will be checked and maintained weekly until all construction is completed. No construction activity, including grading, will be allowed until this condition is satisfied. No	Central Valley to implement measure as defined and incorporate commitments into construction contracts.	Prior to and during construction.	Natural Gas Connecting Pipeline – Segment A	CVGS provide survey documentation on April 13, 2011 verifying that elderberry shrubs located along access roads would be fenced prior to construction.

Attachment A—Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Potential to impact nesting birds during construction.	—	BLIC-10	grading, clearing, storage of equipment or machinery, or other disturbance or activity may occur until the CPUC environmental compliance monitor has inspected and approved all temporary construction fencing. The fencing and a note reflecting this condition will be shown on the construction plans.	Central Valley to implement measure as defined and incorporate commitments into construction contracts.	Central Valley to provide survey report documentation to CPUC and provide verification to CPUC of compliance with measure as defined.	Prior to and during construction for all areas identified as suitable Swanson's Hawk nest habitat.	Compressor Station Remote Well Pad Site Observation Well Conversions Saltwater Disposal Well	Pre-Construction Component Complete In accordance with the memorandum submitted by CVGS on October 21, 2010 a monthly memo has been submitted to CDFG.
Construction of the proposed project could affect undiscovered cultural resources.	—	CR-2	If a Swanson's hawk nest occurs in or adjacent to the project area and could be adversely affected by the increase in ambient noise levels associated with construction, Central Valley will follow CDFG's recommendations for mitigating impacts to Swanson's hawks (CDFG 1984).	Central Valley and its construction contractor will take the steps specified below during project construction. A qualified archaeological monitor will inspect all ground-disturbing activities associated with pipeline construction preparation. Construction preparation will include removal of topsoil in agricultural areas, formation of berms to restrict flooding, and grading of staging areas. If buried cultural resources, such as chipped or ground stone, historic debris, building foundations, or human bone, are discovered inadvertently during ground-disturbing activities, work will stop in the area of the find until a qualified archaeologist can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with CPUC, the State Historic Preservation Officer, and other appropriate agencies. In the event that human remains are encountered, Applicant Proposed Measure CR-3 will be implemented.	The qualifications of the qualified archaeologist shall be submitted to the CPUC prior to construction. CPUC and Central Valley monitor to ensure work is suspended upon discovery of resources to ensure avoidance of all significant cultural resources. If avoidance is not possible upon conclusion of evaluations, data recovery research program exhausts potential of site to yield further important information.	During ground-breaking activities in all construction areas.	Natural Gas Connecting Pipelines – Segments A & B	Pre-Construction Component Complete. Central Valley provided qualifications of the qualified archeologist on April 18, 2011.
Construction of the proposed project could affect undiscovered cultural resources.	CUL-1	—	In the event that any prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, such as chipped or ground stone, historic debris, building foundation, or human bones, all work within 50 feet of the resources shall be halted and a qualified archaeologist shall be consulted to assess the significance of the find. If any find is determined to be significant, representatives of Central Valley, CPUC, and	If necessary during monitoring, Central Valley's archaeologist to prepare ADRP and meet with and submit to CPUC for review within 2 weeks of discovery. Central Valley to implement data recovery as specified in ADRP.	CPUC and Central Valley monitor to ensure work is suspended upon discovery of resources to ensure avoidance of all significant cultural resources. CPUC to review completed ADRP. If avoidance is not possible upon conclusion of evaluations, data recovery research program	During ground-breaking activities in all construction areas.	All	Pre-Construction Component Complete. Central Valley provided qualifications of the qualified archeologist on April 18, 2011 and measures have been included in the contract

Attachment A – Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria exhausts potential on site to yield further important information.	Timing	Project Component	Status
			<p>the qualified archaeologist shall meet to determine the appropriate avoidance measures or other appropriate mitigation, with the ultimate determination to be made by the CPUC. All significant cultural materials recovered shall be subject to scientific analysis; professional museum curatorial, as necessary, and a report prepared by a specialist according to current professional standards.</p> <p>In considering any suggested mitigation proposed by the consulting archaeologist in order to mitigate impacts to historical resources or unique archaeological resources, the CPUC and Central Valley shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for historical resources or unique archaeological resources is carried out.</p> <p>If the CPUC, in consultation with the qualified archaeologist, determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, Central Valley will:</p> <ul style="list-style-type: none"> • Re-design the project to avoid any adverse effect on the significant archaeological resource, or • Implement an archaeological data recovery program (ADRP), unless the qualified archaeologist determines that the archaeological resource is of greater interpretive use than research significance, and that interpretive use of the resource is feasible. If the circumstances warrant an ADRP, such a program shall be conducted. The project archaeologist and the CPUC shall meet and consult to determine the scope of the ADRP. The archaeologist shall prepare a draft ADRP that shall be submitted to the CPUC for review and approval. The ADRP shall identify how the proposed ADRP would preserve the significant information the archaeological resource is expected to contain. That is, the ADRP shall identify the scientific/historical research questions that are applicable to the expected resource, the data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that 					

Attachment A—Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Construction of the proposed project could affect undiscovered Native American human remains.	—	CR-3	If human remains of Native American origin are discovered during project construction, it will be necessary to comply with state laws relating to the disposition of Native American burials, which fall under the jurisdiction of the Native American Heritage Commission (NAHC) (Public Resources Code, Section 5097). If any human remains are discovered or recognized in any location other than a dedicated cemetery, there will be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains, until the following occurs: <ul style="list-style-type: none"> • The Colusa County Coroner has been informed and has determined that no investigation of the cause of death is required • If the remains are of Native American origin: <ul style="list-style-type: none"> ◦ The descendants of the deceased Native Americans have made a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code, Section 5097.98 ◦ NAHC is unable to identify a descendant or the descendant fails to make a recommendation within 24 hours after being notified by the NAHC. 	Central Valley to contact county coroner if human remains are found. Central Valley and coroner to contact NAHC.	CPUC and NAHC to review extraction plan if needed. CPUC and Central Valley monitor to ensure work is suspended upon discovery of resources to ensure avoidance of all significant cultural resources. If avoidance is not possible upon conclusion of evaluations, data recovery research program exhausts potential of site to yield further important information. The qualifications of the qualified archaeologist shall be provided to the CPUC.	During ground-breaking activities in all construction areas.	All	Pre-Construction Component Complete. Central Valley provided qualifications of the qualified archaeologist on April 18, 2011 and measures have been included in the contract documents.
Potential impact paleontological resources during construction.	—	CR-4	Central Valley will implement the following measures to avoid potential impacts on buried or previously unidentified paleontological resources. Conduct paleontological resource training. As part of the preconstruction environmental training program, construction workers will be provided an overview of the paleontological resources that could occur in the project area. The training will be conducted to help construction workers to (1) identify potential paleontological resources encountered during excavation, and (2) review procedures in the event that a potential fossil is found. Specifically, the training may include a discussion of the following: <ul style="list-style-type: none"> • Fossil identification (the paleontologist may present example fossils to the workers) 	Central Valley to provide training as part of the Worker Training Program.	CPUC to inspect periodically to prevent destruction of non-renewable paleontologic resources. CPUC to review and approve monitoring results report that provides the fossils found and their significance.	Prior to and during construction.	All	Pre-Construction Component Complete. Environmental Awareness Training outline provided to CPUC. CPUC verified pre-construction component was completed on March 2, 2011.

Attachment A –Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Potential for impact to the public or environment due to release of hazardous materials into the environment.	HAZ-3	—	<ul style="list-style-type: none"> • The prohibition of collecting or intentionally disturbing fossils • Stopping all excavation and ground-disturbing work within 100 feet of the find • Procedures for notifying supervisors and site monitoring staff • A discussion of the paleontologist's authority to redirect or stop certain work operations • An overview of the actions that the paleontologist may take to identify the sensitivity of a fossil and to recover and curate a fossil. <p>Stop work if paleontological resources are discovered during construction. If a vertebrate fossil is discovered during construction, the contractor will stop work immediately in the area of the find until a qualified professional vertebrate paleontologist can assess the nature and importance of the find and recommend a course of action in consultation with CPUC and other appropriate agencies. If the fossil is determined to be of scientific importance, the course of action will involve preparation, recovery, and museum curation of the fossil. The course of action may also include preparation of a report for publication describing the find. Central Valley will be responsible for ensuring that the recommendations of the paleontologist regarding treatment and reporting are implemented.</p>			During construction.	Natural Gas Connecting Pipelines – Segments A & B	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.
Potential for impact to the public or environment due to release of hazardous materials into the environment.	HAZ-4	—	<p>In the event that soils suspected of being contaminated, based on visual or olfactory evidence or from portable chemical monitoring devices, are removed during excavation activities along the pipeline corridor, the excavated soil will be tested and, if contaminated above soil action levels, shall be disposed of at a licensed waste facility. Any excavated areas which have an odor due to contaminated soil will be covered while one or more samples are being tested to determine the level of contamination. The presence of known or suspected contaminated soil or groundwater will require the supervision of testing and investigation by a licensed professional geologist or engineer, as appropriate, to meet state and federal regulations.</p> <p>If asbestos-cement pipe (ACP) is encountered during construction, the pipe will be removed by hazardous materials trained employees from the construction work area and stockpiled to the side. Containment and removal may be carried out simultaneously with the</p>			During construction.	Central Valley to document compliance with this measure and provide verification to the CPUC.	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be

Attachment A -Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Potential for project to result in a safety hazard for people residing or working near a private air strip.	HAZ-11	—	continuation of construction to the extent possible.	Central Valley to implement measure as defined.	Central Valley to document compliance with this measure and provide verification to the CPUC.	During construction.	Natural Gas Connecting Pipeline – Segment A	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.
Exposure of people or structures to ground acceleration or shaking, which could damage project components.	—	GEO-1	Central Valley will retain a qualified professional geologist or geotechnical engineer to perform a site-specific seismic analysis for the project. The analysis will develop estimated peak ground accelerations and response spectra for the pipelines crossing site. The analysis will use geologic and seismic parameters, including distances to faults, major historical earthquakes, regional seismicity, and subsurface conditions.	Central Valley to implement measures as defined and provide copies of geotechnical evaluations to the CPUC prior to construction of the applicable phase(s).	CPUC to verify that design has incorporated specific conditions to remediate seismic stress impacts.	Prior to construction.	Natural Gas Connecting Pipeline – Segments A and B	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.
Exposure of people or structures to ground acceleration or shaking, which could damage project components.	—	GEO-2	Central Valley will retain an expert in steel pipeline response to earthquakes who will use the results from the ground acceleration and liquefaction study (APM GEO-1) to assess the gas pipeline response to seismic, ground shaking, liquefaction, dynamic compaction, lateral spreading, and strains due to seismic wave propagation. The results and any recommendations contained in this analysis will be used in the design of the pipeline.	Central Valley to implement measure as defined and to retain expert. Central Valley to submit results and any recommendations to CPUC for review and approval prior to construction of the applicable phase(s).	CPUC to review results and verify that design has incorporated specific conditions to remediate seismic sites impacts.	Prior to construction.	Natural Gas Connecting Pipeline – Segment A and B	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.
Exposure of people or structures to seismic related ground failure, including liquefaction, which could damage project components.	—	GEO-4	Central Valley will conduct site-specific geotechnical studies and implement special construction in liquefaction-prone and expansive soil areas. Where appropriate, the measures listed below will be incorporated into the final facilities design:	Central Valley to implement measure as defined and submit site-specific geotechnical analysis to CPUC for review and approval prior to construction of the applicable phase(s).	CPUC to verify that design has incorporated specific conditions to remediate impacts caused by liquefaction-prone and expansive soils.	Prior to construction.	Compressor Station Metering Station Natural Gas Connecting Pipelines – Segments A & B	Pre-Construction Component Complete. CPUC verified compliance with pre-construction component on March 15, 2011.

Attachment A –Mitigation Measures

Impact	MM	APM No.	Mitigation Measure/ Applicant Proposed Measure	Implementation Actions	Monitoring Requirements and Effectiveness Criteria	Timing	Project Component	Status
Potential for landslides or slumping at channel and canal pipeline crossings.	—	GEO-5	Central Valley will ensure that the project is constructed in accordance with all applicable state and county building and construction codes and ordinances related to creek, drainage, and canal crossings. A qualified geologist and geotechnical engineer will be retained to evaluate the stability of the slopes on the pipeline design depth relative to existing slopes, or both, within these water drainages and canals.	Central Valley to implement measure as defined. Central Valley to submit final design to CPUC and California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) for their review and approval prior to reconstruction of the applicable phase(s).	CPUC to verify that design has incorporated specific conditions as defined.	Prior to construction.	Natural Gas Connecting Pipelines – Segments A & B	This measure is not applicable to the proposed construction activities identified in NTP 10A. The pre-construction component will need to be satisfied by CVGS prior to issuance of the NTP associated with construction of the pipeline.

